RICHARD PALMA

ATTORNEY AT LAW 225 BROADWAY-SUITE 715 NEW YORK, NEW YORK 10007 WENO ENDORSED

MEMBER OF THE BAR **NEW YORK**

TEL. (212) 686-8111 E-MAIL - rpalma177@gmail.com

August 11, 2023

8 15/23

ECF

Colleen McMahon

es District Judge

ick Moynihan U.S. Courthouse 500

Associate Counsel

Oranted.

NY 10007

U.S. v. Norman Harrison, 06 Cr. 00041 (CM)

Pursuant to CJA, defense counsel requests and appointments. Honorable Colleen McMahon United States District Judge Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007

Re:

appointment of associate counsel.

Dear Judge McMahon:

As CJA counsel to the defendant in the above-entitled case, I write to respectfully request that The Court appoint Thomas Eddy as associate counsel under the revised CJA plan to assist in the preparation of Mr. Harrison's compassionate release motion.

Mr. Eddy can review the file, do the research and draft the motion, at a lower rate than I would be paid and, while some consultation would be inevitable, we would keep duplicative work to a minimum.

As his attached resume confirms, Mr. Eddy has compiled a record of considerable achievement in the motion, sentencing and appellate contexts in service of CJA counsel and their clients and I believe he would be invaluable in assisting me to provide Mr. Harrison the highest quality representation. The highly capable Mr. Eddy has been appointed to perform similar tasks as \$100 per hour associate counsel by Judge Castel in United States v. Saeed Malik Norris, Dk No. 18 CR 871 (PKC), Judge Seibel in United States v. Ardae Hines, S4 17 Cr. 364 (CS), by Judges Nathan and Oetken in United States v. Leonard Mathews, Dk No. 18 CR 124 (AJN) and at the new \$105 per hour associate rate by Judges Cronan

> **USDC SDNY DOCUMENT**

ELECTRONICALLY FILED

DATE FILED: &

Page 2 Leter to Hon. Colleen McMahon, U.S.D.J. August 11, 2023

and Halpern in <u>United States v. Marco Druskovich</u>, Dk No. 22 CR 309 (JPC) and <u>United States v. Donavan Gillard</u>, Dk No. 7:20-cr-00626 (PMH).

In that the docket is sparse with respect to Mr. Harrison and it appears that the Court relied at sentencing on testimony it witnessed while presiding over his co-defendants' trial, I expect that my representation in this regard will require review of that transcript. For that reason, I would ask that the Court authorize 75 hours, subject to reauthorization, if needed.

If there are any questions, I can be reached immediately at 917-751-5754.

Thank you.

Respectfully submitted, s/ Richard Palma Richard Palma

Encl.